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November 30, 2023

By Electronic Filing

Hon. Andrew L. Carter Jr.
U.S. District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Wright v. Mail Media Inc. et al., No. 23 Civ. 7124 (ALC) (S.D.N.Y.)

Dear Judge Carter:

We represent Defendants Mail Media Inc., Associated Newspapers Ltd., Daily Mail and General Trust plc, DMG Media Ltd., Rich Caccappolo, Paul Dacre, and Gerard Greaves (collectively, “Defendants”) in the above-captioned matter. We write pursuant to Rule 1(D) of this Court’s Individual Practices to request an extension of time to answer or otherwise respond to the Complaint.

Plaintiff has filed affidavits of service or executed summonses for five of the seven Defendants, all except DMG Media Ltd. and Daily Mail and General Trust PLC. Pursuant to those documents, the current deadlines for these Defendants to respond to the Complaint are as follows:

Defendant	Current Deadline
Mail Media Inc.	December 4, 2023
Associated Newspapers Ltd.	December 4, 2023
Rich Caccappolo	December 7, 2023
Gerard Greaves	December 7, 2023
Paul Dacre	December 7, 2023

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Defendants Daily Mail and General Trust plc and DMG Media Ltd. have agreed to execute waiver of summons forms once they are provided by Plaintiff. Defendants also believe Paul Dacre has not yet been properly served, but he will also agree to waive service of the summons upon receipt of the form.

Plaintiff has informed Defendants' counsel that she intends to file an amended complaint shortly. To avoid incurring unnecessary expense in addressing the original Complaint which will soon be moot and to place all of the Defendants on the same schedule, Defendants respectfully request that the deadline for all Defendants to answer or respond be extended to January 8, 2024 or 14 days after service of the anticipated amended complaint, whichever is later. Defendants have not previously sought an extension of this deadline. Plaintiff has consented to this request.

Respectfully submitted,

/s/ Thomas B. Sullivan

cc: Plaintiff Hillary Wright (pro se)